## REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-21 in the application. In response to an election requirement, the Applicants elected Claims 1-14 and canceled Claims 15-21 without prejudice or disclaimer. In the present response, the Applicants have amended Claims 1 and 8 and have added Claims 22-25. Support for the amendment can be found in the original specification on page 20, line 10 to page 24, line 19. Accordingly, Claims 1-14 and 22-25 are currently pending.

## I.     Rejection of Claims 1-14 under 35 U.S.C. §103

The Examiner has rejected Claims 1-14 under 35 U.S.C. §103(a) as being unpatentable over a paper by Tuomas Aura, *et al.,* entitled "DOS-resistant Authentication with Client Puzzles" in view of U.S. Patent No. 5,919,257 to Trostle. The Applicants respectfully disagree since the cited combination does not teach or suggest each element as recited in amended Claims 1 and 8. More specifically, the cited combination does not teach or suggest a database of problems and corresponding precalculated solutions and responding to a request from a client for access to a resource by retrieving one of the problems and transmitting the one problem to a client without allocating resources of a computer system, wherein the problems and the corresponding precalculated solutions exist before the request.

Aura is directed to preventing denial of service attacks by employing stateless authentication protocols and client puzzles. (*See* Abstract.) Aura does not teach or suggest, however, responding to a request from a client for access by retrieving a problem from a database wherein the problem and a corresponding precalculated solution in the database pre-existed before the request. On the contrary, Aura discloses creating new puzzles to send to clients and verifying the

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clients' solution to the puzzle through computing. (*See* page 4, second paragraph, and page 5, last paragraph.) Thus, Aura does not teach or suggest employing a database of problems and corresponding precalculated solutions that exist before a request for access. Additionally, Aura does not teach or suggest responding to the request by retrieving a problem from such a database. Instead, Aura discloses a server that creates a puzzle for clients and computes a solution for the puzzle after receiving a solution for the puzzle from the client.

The Applicants do not find where Trostle cures these deficiencies of Aura. On the contrary, Trostle does not even address responding to requests for access to a resource of a computer system but instead is directed to detecting illicit changes to executable programs within a workstation. (*See* column 1, lines 59-61.) Additionally, while Trostle discloses a database of hash values (*see* column 7, lines 6-8), Trostle provides no teaching or suggestion of a database that also includes problems. (*See* column 7, lines 6-30.) Trostle, therefore, also does not teach or suggest responding to a request from a client for access by retrieving a problem from a database having a corresponding precalculated solution wherein the problem and the corresponding precalculated solution exist before the request as recited in amended independent Claims 1 and 8.

Since the cited combination of Aura and Trostle fails to teach or suggest each element of independent Claims 1 and 8, the cited combination does not provide a *prima facie* case of obviousness of Claims 1 and 8 and Claims dependent thereon. Thus, Claims 1-14 are not unpatentable over the cited combination. Accordingly, the Applicants respectfully request the Examiner to withdraw the §103(a) rejection of Claims 1-14 and allow issuance thereof.

Furthermore, regarding the new claims, the Applicants do not find where the cited combination of Aura and Trostle teach or suggest employing a pointer as recited in Claims 22 and 24

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or wherein the problems are independent of the clients as recited in Claims 23 and 25. (*See* Aura, page 5, second paragraph, and Trostle, column 7, lines 3-8.)


## II.        Conclusion

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-14 and 22-25.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

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